

June 13, 2023

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

UNITED STATES OF AMERICA

v.

HUMBERTO ZEPEDA

§
§
§
§
§

CRIMINAL NO. L-23-CR-757

DS

SEALED INDICTMENT

THE GRAND JURY CHARGES THAT:

Introduction

At various times relevant to the Indictment,

1. The term “person” includes any individual, corporation, company, association, firm, partnership, society, or joint stock company.
2. The term “interstate or foreign commerce” includes commerce between any place in a State and any place outside of that State.
3. The term “firearm” means: 1) any weapon which will or is designed to or may readily be converted to expel a projectile by the action of an explosive, and 2) the frame or receiver of any such weapon.
4. The term “dealer” means any person engaged in the business of selling firearms at wholesale or retail.
5. The term “licensed dealer” means any dealer who is licensed under the provisions of Chapter 44 of Title 18, United States Code.
6. RAK Armory, LLC., and P.T. Armory, LLC. are each a Federal Firearms Licensee (FFL) under the provisions of Chapter 44 of Title 18, United States Code.

COUNT ONE

From on or about **November 11, 2021**, through on or about **November 27, 2021**, in the Southern District of Texas and within the jurisdiction of this Court, Defendant,

HUMBERTO ZEPEDA,

in connection with the acquisition of one or more of the firearms below from P.T. Armory, LLC., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code:

| | DATE | MAKE AND MODEL | CALIBER | SERIAL NUMBER |
|----|-------------------|--|----------------------|----------------------|
| 1 | November 11, 2021 | Radical Firearms, Model RF-15 Pistol | 5.56 NATO | 21-084997 |
| 2 | November 11, 2021 | Radical Firearms, Model RF-15 Rifle | 5.56 NATO | 21-086259 |
| 3 | November 15, 2021 | Radical Firearms, Model RF-15 Pistol | 5.56 NATO | 21-086554 |
| 4 | November 15, 2021 | Century Arms, Model VSKA Rifle | 7.62 x 39 millimeter | SV7095355 |
| 5 | November 15, 2021 | Century Arms, Model VSKA Pistol | 7.62 x 39 millimeter | SV7P004974 |
| 6 | November 15, 2021 | American Tactical, Model Mil-Sport Pistol | 5.56 NATO | MSA088935 |
| 7 | November 22, 2021 | Standard Manufacturing, Model STD-15 Rifle | 5.56 NATO | ARS0010958 |
| 8 | November 22, 2021 | Standard Manufacturing, Model STD-15 Rifle | 5.56 NATO | ARS0011317 |
| 9 | November 27, 2021 | Radical Firearms, LLC., FR-16 Rifle | 5.56 NATO | 21-091720 |
| 10 | November 27, 2021 | American Tactical, OMNI-MAXX P4 Pistol | 5.56 NATO | NS320920 |
| 11 | November 27, 2021 | American Tactical, OMNI-MAXX P4 Pistol | 5.56 NATO | NS320927 |

knowingly made a false and fictitious oral and written statement to P.T. Armory, LLC., which statement was intended and likely to deceive P.T. Armory, LLC., as to a fact material to the lawfulness of such acquisition of the said firearms to the Defendant under Chapter 44 of Title 18, in that **HUMBERTO ZEPEDA** represented on an ATF Form 4473 that he was the actual buyer of the firearm(s) listed on the Form 4473, when, in fact as **HUMBERTO ZEPEDA** knew, he was

not the actual buyer of the firearms.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

From on or about **November 11, 2021**, through on or about **November 27, 2021**, in the Southern District of Texas and within the jurisdiction of this Court, Defendant,

HUMBERTO ZEPEDA,

in connection with the acquisition of one or more of the firearms below from P.T. Armory, LLC., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code:

| | DATE | MAKE AND MODEL | CALIBER | SERIAL NUMBER |
|----|-------------------|--|----------------------|----------------------|
| 1 | November 11, 2021 | Radical Firearms, Model RF-15 Pistol | 5.56 NATO | 21-084997 |
| 2 | November 11, 2021 | Radical Firearms, Model RF-15 Rifle | 5.56 NATO | 21-086259 |
| 3 | November 15, 2021 | Radical Firearms, Model RF-15 Pistol | 5.56 NATO | 21-086554 |
| 4 | November 15, 2021 | Century Arms, Model VSKA Rifle | 7.62 x 39 millimeter | SV7095355 |
| 5 | November 15, 2021 | Century Arms, Model VSKA Pistol | 7.62 x 39 millimeter | SV7P004974 |
| 6 | November 15, 2021 | American Tactical, Model Mil-Sport Pistol | 5.56 NATO | MSA088935 |
| 7 | November 22, 2021 | Standard Manufacturing, Model STD-15 Rifle | 5.56 NATO | ARS0010958 |
| 8 | November 22, 2021 | Standard Manufacturing, Model STD-15 Rifle | 5.56 NATO | ARS0011317 |
| 9 | November 27, 2021 | Radical Firearms, LLC., FR-16 Rifle | 5.56 NATO | 21-091720 |
| 10 | November 27, 2021 | American Tactical, OMNI-MAXX P4 Pistol | 5.56 NATO | NS320920 |
| 11 | November 27, 2021 | American Tactical, OMNI-MAXX P4 Pistol | 5.56 NATO | NS320927 |

knowingly made a false and fictitious oral and written statement to P.T. Armory, LLC., which statement was intended and likely to deceive P.T. Armory, LLC., as to a fact material to the lawfulness of such acquisition of the said firearms to the Defendant under Chapter 44 of Title 18,

in that **HUMBERTO ZEPEDA** represented on an ATF Form 4473 that he resided at a property located in the 4000 block of Bluemel Road, San Antonio, Texas when in fact, as **HUMBERTO ZEPEDA** knew, he did not reside at said residence.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

On or about **December 8, 2021**, in the Southern District of Texas and within the jurisdiction of this Court, Defendant,

HUMBERTO ZEPEDA,

in connection with the acquisition of one or more of the firearms below from RAK Armory, LLC., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code:

| | DATE | MAKE AND MODEL | CALIBER | SERIAL NUMBER |
|---|------------------|---------------------------------|-----------------|----------------------|
| 1 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS323701 |
| 2 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS323723 |
| 3 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS323986 |
| 4 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS322994 |
| 5 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS323294 |
| 6 | December 8, 2021 | Delton, Model DTI-15 Long Gun | 5.56-millimeter | DTI-S247246 |
| 7 | December 8, 2021 | Delton, Model DTI-15 Long Gun | 5.56-millimeter | DTI-S244498 |

knowingly made a false and fictitious oral and written statement to RAK Armory, LLC., which statement was intended and likely to deceive RAK Armory, LLC., as to a fact material to the lawfulness of such acquisition of the said firearms to the Defendant under Chapter 44 of Title 18, in that **HUMBERTO ZEPEDA** represented on an ATF Form 4473 that he was the actual buyer of the firearm(s) listed on the Form 4473, when, in fact as **HUMBERTO ZEPEDA** knew, he was

not the actual buyer of the firearms.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

On or about **December 8, 2021**, in the Southern District of Texas and within the jurisdiction of this Court, Defendant,

HUMBERTO ZEPEDA,

in connection with the acquisition of one or more of the firearms below from RAK Armory, LLC., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code:

| | DATE | MAKE AND MODEL | CALIBER | SERIAL NUMBER |
|---|------------------|---------------------------------|-----------------|----------------------|
| 1 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS323701 |
| 2 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS323723 |
| 3 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS323986 |
| 4 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS322994 |
| 5 | December 8, 2021 | ATI, Model Omni Hybrid Long Gun | 5.56-millimeter | NS323294 |
| 6 | December 8, 2021 | Delton, Model DTI-15 Long Gun | 5.56-millimeter | DTI-S247246 |
| 7 | December 8, 2021 | Delton, Model DTI-15 Long Gun | 5.56-millimeter | DTI-S244498 |

knowingly made a false and fictitious oral and written statement to RAK Armory, LLC., which statement was intended and likely to deceive RAK Armory, LLC., as to a fact material to the lawfulness of such acquisition of the said firearms to the Defendant under Chapter 44 of Title 18, in that **HUMBERTO ZEPEDA** represented on an ATF Form 4473 that he resided at a property located in the 4000 block of Bluemel Road, San Antonio, Texas when in fact, as **HUMBERTO ZEPEDA** knew, he did not reside at said residence.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

ORIGINAL SIGNATURE ON FILE

FOREMAN OF THE GRAND JURY

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



Brian Bajew
Assistant United States Attorney

USA-74-24b
(Rev. 6-1-71)

CRIMINAL DOCKET

LAREDO DIVISION

NO. **L-23-CR-757**

FILE: 22-01222 MAG#: 00-00000
INDICTMENT Filed: 06/13/2023

Judge: **DS**

UNITED STATES OF AMERICA

ATTORNEYS:

VS.

ALAMDAR S. HAMDANI, USA
BRIAN BAJEW, AUSA

HUMBERTO ZEPEDA

CHARGES:

Counts 1-4: False statements during purchase of a firearm
[18 USC 922(a)(6) and 924(a)(2)]

TOTAL COUNTS: 4

PENALTY:

Counts 1-4: 0 to 10 years imprisonment and/or fine of not more than \$250,000, \$100 special assessment, and up to three years of supervised release [Each Count]